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April 24, 2015

Honorable Laura Taylor Swain
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: US v. Joseph Hunter, 13 cr. 521 (LTS)

Dear Judge Swain:

I represent Joseph Hunter in the above referenced matter. He is scheduled to be sentenced on May 29, 2015. I request an adjournment of the sentence to the week of July 13, 2015. This is my first request for an adjournment.

Mr. Hunter plead guilty to several counts in the indictment on February 13, 2015. Mr. Hunter is facing a sentence of life in prison. The draft probation report has already been completed and mailed to the parties. I will file timely objections to the probation report. However, I need additional time to complete the sentencing memorandum. There are many documents that I have not yet received that are critical to the sentencing memorandum. I should be able to receive all of those documents over the next 4-6 weeks. Also, this is a fairly complex sentence. This Court has substantial discretion and it is important for me to submit all documents in support of a request for a reasonable sentence under 18 U.S.C. 3553(a). I have the consent of the Government for this request.

Please contact me if you have any questions or concerns.

Sincerely,

s/Marlon G. Kirton
Marlon G. Kirton, Esq.

cc: Michael Lockard, Assistant United States Attorney (via electronic mail)
Anna Skotko, Assistant United States Attorney (via electronic mail)
Emil Bove, III, Assistant United States Attorney (via electronic mail)
Diane Ferrone, Esq. (via electronic mail)